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Amendment and/or Response
Reply to Office action of March 30, 2004

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REMARKS/DISCUSSION OF ISSUES

Upon entry of the present amendment, claims 1-22 are pending, with claims 1, 14 and 19 being the independent claims.

Approval of the drawing figures is respectfully requested.

Rejection under 35 U.S.C. § 102(b)

The Office rejects claims 1-22 under 35 U.S.C. § 102(a) in view of *Ramaswamy, et al.* (E.P. 1 508 422 A1). For at least the reasons set forth below, it is respectfully submitted that independent claims 1, 11 and 19, and the claims that depend therefrom are patentable over the applied art.

To properly establish a *prima facie* case of anticipation, *all* of the claims elements must be found in the prior art. It follows, therefore, that if a *single* claimed element is not found in the prior art, a *prima facie* case of anticipation cannot be properly established.

Claim 1 is drawn to a system for facilitating UPnP control of a plurality non-UPnP devices on one or more slave networks, where *the one or more slave networks include one or more different networking technologies other than a Home Audio-Video Interoperability (HAVi) compatible network technology.*

Contrastingly, the reference to *Ramaswamy, et al.* teaches bridging a UPnP sub-network and a HAVi sub-network. However, the reference to *Ramaswamy, et al.* specifically lacks the teaching of UPnP control of non-UPnP devices on one or more slave networks, where at least one of the non-UPnP devices is **other** than a HAVi compatible device. Therefore, because the reference to *Ramaswamy, et al.* fails to disclose at least one of the features of claim 1, claim 1 is allowable over the applied art.

Claim 11 is drawn to a method of facilitating UPnP control of a plurality of non-

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UPnP devices, where *at least one of the plurality of non-UPnP devices is not a Home Audio-Video Interoperability (HAVi) compatible device*. For reasons similar to those described in connection with claim 1, it is respectfully submitted that the reference to *Ramaswamy, et al.* lacks the at least the above-noted feature of claim 11. Therefore, because the reference to *Ramaswamy, et al.* fails to disclose at least one of the features of claim 11, claim 11 is allowable over the applied art.

Claim 19 is drawn to a network including an IP sub-network and a non-IP sub-network, *which is other than a Home Audio-Video Interoperability (HAVi) sub-network*. For reasons similar to those described in connection with claims 1 and 11, it is respectfully submitted that the reference to *Ramaswamy, et al.* lacks the disclosure of at least the above-noted feature of claim 19. Therefore, because the reference to *Ramaswamy, et al.* fails to disclose at least one of the features of claim 19, claim 19 is allowable over the applied art.

For at least the reasons set forth above, it is respectfully submitted that the reference to *Ramaswamy et al.* lacks at least one of the features of each of claims 1, 11 and 19, it cannot serve to establish a *prima facie* case of anticipation of these claims or the claims that depend therefrom. As such, it is respectfully submitted that claims 1, 11 and 19 and the claims that depend directly or indirectly therefrom are allowable over the applied art.

Conclusion

In view of the foregoing, applicant(s) respectfully request(s) that the Examiner withdraw the rejections of record, allow all the pending claims, and find the application to be in condition for allowance.

If any points remain in issue, the Examiner is respectfully requested to contact the undersigned at the telephone number listed below.

If necessary, the Commissioner is hereby authorized in this, concurrent, and further replies to charge payment or credit any overpayment to Deposit Account Number 50-0238 for any additional fees under 37 C.F.R. §1.16 or under 37 C.F.R.

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§1.17. Petition is hereby made for a one-month extension of time as provided by 37 C.F.R. 1.136(a). Permission is hereby given to charge Deposit Account Number 50-0238 for the fee required under 37 C.F.R. §1.17.

Respectfully submitted on behalf of
Philips Electronics N.A., Corp.



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